REMARKS

Claims 1-20 are pending in this application. By this Amendment, claims 1, 9, 18 and 20 are amended to even further distinguish over the applied references. No new matter is added.

Applicants appreciate the courtesies shown to Applicants' representative by Examiner Tyler in the January 18, 2008 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks. As agreed at the personal interview, and pending further consideration, the claims distinguish over the applied references.

I.   The Claims Are Patentable Over The Applied References

The Office Action (1) rejects claims 1-2, 5, 8-10, 13, 15-18 and 20 under 35 U.S.C. §103(a) over U.S. Patent No. 5,333,064 to Seidner et al. (Seidner) in view of U.S. Patent No. 5,343,309 to Roetling; (2) rejects claims 3-4, 6, 11-12 and 19 under 35 U.S.C. §103(a) over Seidner in view of Roetling, and further in view of U.S. Patent No. 5,822,467 to Lopez et al. (Lopez); and (3) rejects claims 7 and 14 under 35 U.S.C. §103(a) over Seidner in view of Roetling, and further in view of U.S. Patent No. 6,538,771 to Sakatani et al. (Sakatani). Applicants respectfully traverse the rejections.

Regarding independent claims 1, 9, 18 and 20, the applied references fail to disclose or suggest (1) "filtering the image data using the selected two or more filters from the filter bank such that the image data is filtered by each of the selected two or more filters resulting in two or more filtered image data each corresponding to either the entire image data or a same portion of the image data" and (2) "blending the two or more filtered image data to form blended image data" as recited in claim 1 and as similarly recited in claims 9, 18 and 20.

Seidner discloses a method for descreening a half-tone (HT) image including the steps of evaluating screen parameters (Fig. 7, step 50; col. 12, lines 55-60) which can include the

frequency; calculating screen removal filters 20 (Fig. 7, step 52; col. 12, lines 66-68); and

performing the descreening (Fig. 7, step 56).

Roetling is directed to adaptive filtering to provide improved reconstruction of a

continuous tone (contone) image from a halftone image. The halftone pattern frequency can

be determined by various methods or can be estimated (col. 5, lines 16-28). A halftone image

is subjected to lowpass spatial filtering to remove the fundamental and harmonic frequencies

(col. 5, lines 37-47) to produce a first approximation image (FAI) (col. 6, lines 29-31). Next,

the FAI is processed by an adaptive filter at block 36 (Fig. 2; col. 6, lines 39-40). The

adaptive filter provides one or more sets of predetermined filters, the particular filter used for

each processed pixel being selected under feedback control "based on the content of the FAI

in the block 34" (col. 6, lines 40-45).

Regarding feature (1) above, the Office Action alleges that Roetling discloses the use

of two filters to filter the image data at col. 5, line 38 and Fig. 2. However, Roetling, at best,

discloses use of different filters to filter different pixels, not the use of two or more filters that

produces filtered image data that corresponds to either the entire image data or a same portion

of the image data, as recited in the claims. Roetling discloses filtering each processed pixel

by a single filter. Thus, each part of the image data is filtered by only one filter.

As a first example, Roetling discloses "The functioning of the adaptive filter is

"adaptive" in the sense that the particular filter used for each processed pixel is selected under

feedback control ..." (col. 6, lines 42-45; emphasis added). As a second example, Roetling

states "filter control, specify filter as function of gradient (derivative) for current pixel" (Fig.

2, element 38; emphasis added). As a third example, Roetling discloses "from filters with

selected aspect ratio - select filter with orientation of major axis" (Fig. 3, element 46;

emphasis added) and "control adaptive filter - specify selected filter for current pixel" (Fig. 3,

2, element 38; emphasis added). As a third example, Roetling discloses "<u>from filters</u> with selected aspect ratio - <u>select filter</u> with orientation of major axis" (Fig. 3, element 46; emphasis added) and "control adaptive <u>filter</u> - specify selected <u>filter</u> for current pixel" (Fig. 3, element 48; emphasis added). As evidenced by these examples, Roetling discloses using a single filter to filter a given processed pixel.

Regarding feature (2) above, while the applied references allegedly output an image that includes the results of filtering different pixels by different filters, the applied references fail to disclose or suggest any blending of two or more filtered image data (or a plurality of image data) where the filtered image data results from filtering image data by each of two or more selected filters to produce two or more filtered image data (or a plurality of filtered image data) that corresponds to either the entire image data or a same portion of the image data, as recited in the claims.

For the foregoing reasons, Applicants request withdrawal of the rejections.

II.   <u>Conclusion</u>

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,

James A. Oliff
Registration No. 27,075

Jonathan H. Backenstose
Registration No. 47,399

JAO:JHB/jhb

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OLIFF & BERRIDGE, PLC
P.O. Box 320850
Alexandria, Virginia 22320-4850
Telephone: (703) 836-6400

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